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14 UNITED STATES DISTRICT COURT
15
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 BRUCE MACDONALD, Individually and on
18 Behalf of All Others Similarly Situated,

19 Plaintiff,

20 v.

21 DYNAMIC LEDGER SOLUTIONS, INC., a
22 Delaware corporation, TEZOS
23 STIFTUNG, a Swiss Foundation,
24 KATHLEEN BREITMAN, an
25 Individual, ARTHUR BREITMAN,
26 an Individual, TIMOTHY COOK DRAPER, an
27 individual, DRAPER ASSOCIATES, JOHANN
28 GEVERS, DIEGO PONZ, GUIDO SCHMITZ-
KRUMMACHER, BITCOIN SUISSE AG,
NIKLAS NIKOLAJSSEN and DOES 1-100,
INCLUSIVE,

Defendants.

Case No. 3:17-cv-07095-RS

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
EXPEDITED DISCOVERY**

1 This matter comes before the Court on the motion of Plaintiff Bruce MacDonald ("Plaintiff") for
2 an Order pursuant to Federal Rule of Civil Procedure 26(d)(1) permitting Plaintiff to serve take
3 expedited discovery before the parties' Rule 26(f) conference.

4 Having reviewed the materials submitted and being fully advised, the Court GRANTS Plaintiff's
5 motion as follows:
6

- 7 a. Plaintiff may serve immediately the document requests and notices of deposition attached
8 to his Motion as Exhibits A, B, and C.
- 9 b. Defendants Tezos Stiftung, Dynamic Ledger Solutions, Inc., and Bitcoin Suisse AG shall
10 produce documents responsive to Plaintiff's document requests by _____, 2018.
- 11 c. Defendants Tezos Stiftung and Dynamic Ledger Solutions, Inc. shall produce for
12 deposition one or more officers, directors, or managing agents, or other persons who
13 consent to testify on their behalf about information known or reasonably available to each
14 organization regarding the matters identified in Plaintiff's notices of deposition by
15 _____, 2018.
16

17
18 **DATED:**

The Hon. Richard Seeborg
United States District Judge

19 Presented by:

20
21 **HAGENS BERMAN SOBOL SHAPIRO LLP**

22 By: /s/ Reed R. Kathrein

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